## REMARKS

Claims 1-15 are pending in this application. Claims 1-15 have been amended. Claims 16-19 are new. The present response is an earnest effort to place all claims in proper form for immediate allowance. Reconsideration and passage to issuance is therefore respectfully requested.

ISSUES UNDER 35 U.S.C. § 112

Claims 1-6 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Accordingly, Applicant has amended claim 1 so the limitation "the motor gear" now reads "the drive gear", which has antecedent support. Therefore, the rejection to claims 1-6 under 35 U.S.C. § 112, second paragraph, should be withdrawn.

ISSUES UNDER 35 U.S.C. § 102

Claims 1-15 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Fried.

Amended independent claim 1 is not anticipated by Fried. Claim 1 provides that both pumps are mounted on the same pump plate. In Fried, each pump unit 27 has its own plate 40. See Fried, column 4, lines 8-9. Fried does not mount two pumps 27 on the same plate 40. Thus, Fried fails to meet this limitation of claim 1.

Claim 1 also requires that the pump plate remains connected to the base plate when moved between first and second positions. More particularly, claim 1 states that the pump plate is connected to the base plate and further is "moveable while attached to the base plate between a

first position and a second position relative to the base plate." Fried specifically teaches that each pump unit 27, to be moved from the first position to the second position for alternative engagement with gears 33, 34, must be removed from the cradle 10A, turned through an angle of 180°, and then reinserted into the cradle 10A (column 6, lines 33-39). Clearly, the pump plate 40 in Fried is not moveable between the first position (FIG. 6) and the second position (FIG. 7) unless the pump plate 40 is removed from the cradle 10A.

Claim 1 also requires that the gear for each pump mesh with the drive gear 14 attached to the motor 16 as best illustrated in FIG. 1 of Applicant's drawings. Fried does not teach that either the first pump or second pump mounted on the pump plate have a gear in mesh with the drive gear when the pump plate is in first and second positions. Fried clearly teaches that gear 55 of pump units 27 meshes with drive gear 33 or 34 and not drive gear 28A fixed to the output shaft 28 of the motor M.

Accordingly, claim 1 distinguishes over Fried so as to be allowable, since Fried fails to disclose each and every limitations of claim 1. Thus, claim 1 is allowable, along with depending claims 2-6.

With respect to claims 2-6, there are independent bases for patentability. Dependent claim 2 requires that moving the pump plate from the first to the second position disengages the first gear of the first pump from the drive gear and engages the gear of the second pump to the drive gear. In Fried, moving one pump unit 27 does not affect movement of another pump unit 27. In fact, Fried teaches strictly against this type of operation and requires "1 to 10 or more individual pump units which are arranged in side by side relation, each of the pump units being independently operable by the drive means." (See Abstract of Fried).

Independent claim 3 requires that the base plate be mountable to a building wall so that the motor is on one side of the building wall and the pumps are on the other side of the building wall. Fried does not teach mounting the motor and pumps on opposite sides of a building wall.

With respect to independent claim 4, claim 4 requires that "a plurality of threaded studs on the base plate extend through slots on the pump plate to thereby detachably mount the pump plate to the base plate." Fried does not disclose threaded studs extending through slots on the pump plate whereby the pump plate is attached to the base plate.

Dependent claim 5 requires that "the pump plate includes at least one slot extending through the pump plate to provide the first and second positions and the base plate includes a pin extending through the slot whereby the pump plate slides between the first and second positions." Fried does not disclose at least one slot extending through the pump plate to provide the first and second positions nor a pin extending through the slot whereby the pump plate slides between the first and second positions.

Dependent claim 6 requires that "a hand actuated knob is threaded onto threaded studs on the base plate to thereby adjustably secure the pump plate in the first and second positions." Fried does not disclose a hand actuated knob threaded onto the threaded studs to adjust the pump plate between the first and second positions, since the pump 27 has to be rotated 180° for movement between the gears 33,34.

Accordingly, claims 2-6 further distinguish over the Fried patent and should be allowable as depending from an allowable base claim.

Fried does not anticipate claim 7. Claim 7 requires two pumps mounted to one pump plate. Amended independent claim 7 also requires moving the pump plate while attached to the base plate to first and second positions relative to the base plate. Fried teaches one pump unit per

pump plate, and that the pump units 27 must be removed from the cradle 10A to affect movement of the pump plate between the first and second positions. Therefore, Fried does not disclose each and every limitation of claim 7, so the rejection to claim 7 should be withdrawn. Claims 8-11 depend from claim 7 and should be allowable as depending from an allowable parent claim.

Amended dependent claims 8-11 provide independent bases for patentability. Claim 8 requires disengaging the first pump from the drive motor by shifting the pump plate. Fried does not disclose shifting the pump plate to disengage the first or second pumps, but requires that the pump unit 27 (with pump plate 40) be removed from the cradle 10A, rotated 180°, and then reinserted to affect movement between first and second positions. Claim 9 requires that the base plate with motor and first and second pumps be mounted on opposite sides of the building wall. Fried does not teach mounting these components on opposite sides of the building wall. Claim 10 requires that the pump plate be detachably mounted to threaded studs on the base plate. Fried does not teach detachably mounting the pump plate to threaded studs on the base plate. Lastly, dependent claim 11 requires "securing a hand knob to threaded studs on the base plate to thereby keep the pump plate in the first and second positions." Fried does not teach securing hand knobs to threaded studs to keep the pump plate in the first and second positions.

Accordingly, claims 8-11 further distinguish over the Fried patent and should be allowable as depending from an allowable base claim.

Fried does not anticipate independent claim 12. As amended, independent claim 12 requires "movement of either pump simultaneously affecting movement of the other pump between first and second positions whereby the gear of one of the pumps is meshed with the drive gear and the gear of the other one of the pumps is disengaged from the drive gear in each

position." Fried requires that each of the individual pump units 27 be separate from the other to thereby facilitate mounting, moving or interchanging any number of the pump units 27 (column 6, lines 23-25). Clearly, movement of one of the pump units 27 in Fried does not affect movement of any of the other pump units 27 within the cradle 10A. Further, the gear 55 of the pump 27 in Fried is not meshed with the drive gear 28A which is attached to the motor as required by claim 12. Therefore, claim 12 distinguishes over Fried so as to be allowable, since Fried fails to disclose two of the limitations required by claim 12.

Amended dependent claims 13-15 further provide additional bases for patentability over Fried. Claim 13 requires that the pumps are mounted on a pump plate which is moveable to move the pump plates between the first and second positions while mounted on the base plate. As argued previously, Fried does not teach moving the pump unit 27 while still positioned in the cradle 10A. Claim 14 requires the base plate have a plurality of threaded studs and the pump plate be adjustably mounted and moveable with respect to the plurality of threaded studs. Fried does not disclose the base plate having a plurality of threaded studs, nor does Fried teach that the pump plate is adjustably mounted and moveable with respect to such threaded studs. Dependent claim 15 has been amended to depend from claim 14 and requires a hand actuated knob to secure the plurality of threaded studs to thereby selectively lock the pumps in first and second positions. Fried does not disclose this limitation. Therefore, claims 13-15 further distinguish over Fried and should be allowable as depending from an allowable base claim.

NEW CLAIMS

Claims 16-19 are new claims. Independent claim 16 and dependent claims 17-19 do not add new matter. Support for these new claims can be clearly found in the Specification as previously submitted. Claim 16 requires first and second pumps mounted to a pump plate. As discussed above, Fried has only one pump on each pump plate. Claim 16 also requires one or more slots in the pump plate having first and second positions. Fried has no such slots in the pump plate. Therefore, claim 16 and depending claims 17-19 are allowable.

CONCLUSION

Please charge Deposit Account No. 26-0084 the amount of $100.00 for one new independent claim over three. No other fees or extensions of time are believed to be due in connection with this amendment; however, consider this a request for any extension inadvertently omitted, and charge any additional fees to Deposit Account No. 26-0084.

Reconsideration and allowance is respectfully requested.

Respectfully submitted,

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